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MEMORANDUM

DATE:	2024-09-19	RWDI Reference No.: 2300540.44
TO:	Janine Fletcher	EMAIL: JFletcher@regionofwaterloo.ca
FROM:	Ben Coulson	EMAIL: Ben.Coulson@RWDI.com
RE:	Response to Noise Peer Review Comments 400 Millenium Boulevard (Millenium Lands, Block 320) Waterloo, ON	

Dear Ms. Fletcher,

RWDI has reviewed the letter dated July 26, 2024 from Stantec (the "Response Letter") which provides responses to our noise peer review comments from February 29, 2024.

Responses to Peer Review Comments

Predominantly the peer review comments have been accepted and the Response Letter indicates they will be addressed in an updated version of the noise assessment. Based on some of the responses, additional comments are provided below with reference to the original RWDI peer review numbering scheme (also consistent with the Response Letter).

13. (c)(i) The provided rationale is appropriate that the existing receptor at 515 Country Squire Road will be more limiting for the Enova emergency generator than the proposed development based on separation distance. However, the current development plans do not include sufficient detail to support the expected separation distance of 345 m to the nearest development sensitive receivers, including outdoor points of reception. Support for the distance assertion must be demonstrated (ideally visually) in an updated noise assessment.
13. (c)(ii) The provided rationale is reasonable that the emergency generator southeast of Enova Power is assumed to meet the exemption requirements of Section 4.(1) of O.Reg. 524/98. However, item 7 of these requirements is to meet a sound level of 75 dBA at a distance of 7 m from the generator. The sound contours included in the original noise assessment (i.e., Figure 2 of Appendix A) appear to use a sound emission for this source that is much lower than the O.Reg. 524/98 specification (i.e., about 12 dB); hence why reference sound power information must be included per comment 13 (e). Currently, the proposed rationale in the Response Letter and results of the noise assessment appear to be at odds with one another.



13. (d) The observations made of the Enova Power yard during the site visits are noted, including the lack of impulsive noise activity. However, site visits are only representative of conditions at the time and may not capture worst-case operations. The operations described and nature of this facility indicate that such impulses must be assumed to be probable (i.e., the bangs associated with loading heavy equipment). Appropriate worst-case conditions can be confirmed through communication with the facility owner, as requested in the peer review. The Response Letter provides no indication of communication with the facility as requested.

Additional Considerations

In addition to the stationary noise sources identified and discussed, this review noted that a solar facility is also located at Enova Power (formerly Waterloo North Hydro) on the eastern side of the site as visible in Google Street View. This facility includes noise-emitting equipment (i.e., inverters and transformers) as outlined in the EASR Registration (#R-006-3112693289) available through the MECP's Access Environment website. These sources should also be considered in any updated noise assessment as their aggregate contribution along with the other identified sources may affect sound levels at the development.

Recommendations

The requests made in the original peer review, along with the above comments, are not anticipated to make the proposed development infeasible. However, they may constrain the development design or require at-source mitigation which would need to be negotiated with the source owner. A pre-emptive note that Class 4 limits would not be appropriate here to deal with any excess sound levels.

On the above basis, it is recommended that a holding provision be placed on the lands subject to the Region's acceptance of an updated noise assessment that addresses the original peer review comments, and the additional comments included herein. In keeping with Region expectations, assessment of noise from on-site noise sources must also be addressed before the holding provision is lifted.

Closing

We trust this is the information you require currently. Please do not hesitate to contact us for further clarification.

Yours truly,

Benjamin Coulson, M.A.Sc., P.Eng.
Principal/Senior Consultant
RWDI

September 19, 2024